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December 10, 1999

Dr. Elizabeth Yetley  
Office of Special Nutritionals  
Food and Drug Administration  
200 C Street SW  
Washington D.C. 20204

Dear Dr. Yetley:

We are offering for sale the following product Pure Gels Grape Seed Extract, with the following Structure/Function claim: Provides Antioxidant Support.

The FDA disclaimer will also appear on the label.

Sincerely,

Katie Ferren  
Marketing Director

97S - 0162

*The Mass Market Division of Soft Gel Technologies, Inc. (SGTI)*  
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